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MAR - 5 2019

U.S. District Court
Eastern District of MO
ENRICO TAYLOR

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
DIVISION

(Write the full name of each plaintiff
who is filing this complaint. If the
names of all the plaintiffs cannot fit in
the space above, please write "see
attached" in the space and attach an
additional page with the full list of
names.)

v.

LEADEC CORP.,
MEGAN GLOWACKI

(Write the full name of each defendant.
The caption must include the names of
all of the parties. Fed. R. Civ. P. 10(a).
Merely listing one party and writing "et
al." is insufficient. Attach additional
sheets if necessary.)

Complaint for a Civil Case
INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS, EXTORTION

Case No.
(to be assigned by Clerk of
District Court)

Plaintiff requests trial by jury:

☒ Yes ☐ No

CIVIL COMPLAINT

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the \$400.00 filing fee or an application to proceed without prepaying fees or costs.

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ENRICO TAYLOR
Street Address	8205 MIDWOOD AVE
City and County	BERKELY
State and Zip Code	MISSOURI, 63134
Telephone Number	323-713-5101
E-mail Address	ENRICO@IDISCOVERSTARS.TV

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	LEADEC CORPORATION
Job or Title	
Street Address	9395 KENWOOD ROAD
City and County	CINCINNATI
State and Zip Code	OHIO, 45242
Telephone Number	513-731-3590
E-mail Address	Sydney.Wiskirchen@leadec-services.com

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. *(Include all information that applies to your case)*

A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

C. Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

1. The Plaintiff(s)

The plaintiff, *(name)* ENRICO TAYLOR, is a citizen of the
State of *(name)* MISSOURI.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) _____, is a citizen
of the State of (name) _____ Or is a citizen
of (foreign nation) _____.

If the defendant is a corporation

The defendant, (name) _____ LEADEC CORPORATION _____.
is incorporated under the laws of the State of (name)
_____ DELAWARE _____, and has its principal place of
business in the State of (name) _____ OHIO _____ Or
is incorporated under the laws of the State of (foreign nation)
_____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because *(explain)*:

CONTROVERSY IS MORE THAN \$75,000 BECAUSE THE DEFENDANTS NOT ONLY WRONGFULLY TARGETED AND TERMINATED THE PLAINTIFF'S MOTHER BASED UPON HER FMLA PROTECTED STAT, BUT ALSO EXTORTIONARILLY THREATENED THE PLAINTIFF DURING PRE-LITIGATION CAUSING IIED.

III. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

1. THE DEFENDANTS WRONGFULLY TARGETED AND TERMINATED THE PLAINTIFF'S MOTHER WHO WAS INTENTIONALLY WITHHELD INFORMATION ABOUT HER FMLA HOURS BY HR HEAD, CHERYL HERTFELDER, WHICH STOPPED HER INSURANCE AND CAUSED THE PLAINTIFF ECONOMIC AND EMOTIONAL DISTRESS BY HAVING TO PAY FOR THE PLAINTIFF'S MOTHER'S LIVING EXPENSES. THIS BEHAVIOR WAS EXTREME & OUTRAGEOUS.

WHEN THE PLAINTIFF INFORMED THE DEFENDANTS OF THE WRONGFUL TERMINATION AND ALSO DISCLOSED THAT THE PLAINTIFF'S MOTHER WAS SUFFERING FROM A LIFE THREATENING BLOODCLOT AND COULD NOT AFFORD MEDICATION DUE TO SUDDEN LOSS OF INSURANCE, THE DEFENDANTS VIA THEIR ATTORNEY, CO-DEFENDANT MEGAN GLOWACKI, THREATENED TO CALL THE POLICE ON THE PLAINTIFF FOR EXERCIZING HIS CONSTITUTIONALLY PROTECTED RIGHTS TO PRE-LITIGATE AND HOLD CORPORATE OFFICERS RESPONSIBLE VIA THE RESPONSIBLE CORPORATE OFFICER DOCTRINE. THE PLAINTIFF EXPERTS FOR DEPRESSION CAUSED.

THE EXTORTION WORKED AS THE PLAINTIFF, AS AN AFICAN AMERICAN MAN, FEARED THE POLICE BEING FALSELY CALLED ON HIM DURING PRE-LITIGATION AND THEREFORE THE DEFENDANTS WERE ABLE TO STOP THE PLAINTIFF FROM HOLDING ANY OTHER CORPORATE OFFICER RESPONSIBLE FOR THE POTENTIAL DEATH OF HIS MOTHER CAUSING THE PLAINTIFF GREAT FEAR, ANGUISH AND EVEN MORE EMOTIONAL DISTRESS.

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

THE PLAINTIFF IS REQUESTING \$1,000,000 IN DAMAGES FROM THE DEFENDANTS VIA THE COURT FOR INTENTIONALLY INFLECTING EMOTIONAL DISTRESS ON THE PLAINTIFF WHO FOUGHT TO SAVE HIS MOTHER'S LIFE THAT WAS WRONGFULLY TERMINATED BY A WOMAN FAMILIAR WITH MO EAST DISTRICT COURT CASE 4:07CV01494.

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒ No ☐

Do you claim punitive monetary damages?

Yes ☒ No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

THE ACTUAL DAMAGES ARE APPROXIMATELY \$3,000 HOWEVER THE PUNITIVE DAMAGES ARE \$997,000.00 DUE TO THE EMOTIONAL DISTRESS CAUSED BY THE PLAINTIFF NOT KNOWING IF HIS MOTHER WOULD DIE DUE TO THE ILLEGAL AND DISCRIMINATORY ACTIONS OF THE DEFENDANT PLUS THE ANTI-SLAPP MEASURES USED FOR FEAR.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 5TH day of MARCH, 20 19.

Signature of Plaintiff(s) 

STATEMENT OF FACTS continued

2. THIS HAPPENED TO THE PLAINTIFF BETWEEN DECEMBER 3, 2018 - CURRENT. THOUGH LEADEC HAS SINCE ADMITTED THAT THE PLAINTIFF'S MOTHER WAS WRONGFULLY TERMINATED THIS ONLY HAPPENED AFTER 2 THINGS.

A) FOLLOWING THE FACT THAT THE PLAINTIFF SHOWED THE DEFENDANT'S THE CASE NUMBER WERE CHERYL HERTFELDER, WAS ALREADY ACCUSED OF DISCRIMINATING AGAINST A MAN WITH HEALTH ISSUES OVER A DECADE AGO.

B) AFTER THE PLAINTIFF MADE THE DEFENDANTS AWARE THAT HE WAS COMPLETELY AWARE THAT THE ACTIONS OF THE ATTORNEY, CO-DEFENDANT MEGAN GLOWACKI, WAS NOT ONLY EXTORTIONATE IN NATURE BUT AN ANTI-SLAPP ACTION INTENDED TO SCARE THE PLAINTIFF FROM HOLDING CORPORATE OFFICERS ACCOUNTABLE FOR WHAT THE PLAINTIFF ASSUMED WOULD RESULT IN THE DEATH OF HIS MOTHER.

3. THE INJURY HAPPENED IN MISSOURI AND PERSISTED TO PRESENT DATE VIA THE HR HEAD CHERYL HERTFELDER'S RETALIATORY ACTIONS THAT FOLLOWED THE REINSTATEMENT OF THE PLAINTIFF'S MOTHER.

4. THE INJURIES THAT THE PLAINTIFF SUFFERED WERE BOTH ECONOMICAL WITH THE PLAINTIFF HAVING TO TAKE CARE OF HIS MOTHER'S LIVING EXPENSES DURING THE WRONGFUL TERMINATION PERIOD AS WELL AS WAKE UP DAILY IN FEAR THAT HIS MOTHER WOULD DIE WITH THE BLOOD CLOT MEDICATION BEING UNAFFORDABLE WITHOUT INSURANCE. THE PLAINTIFF FELL BEHIND ON HIS BILLS, MAXED OUT HIS CREDIT CARDS, AND OVERDRAFTED HIS BANK ACCOUNT TO HELP HIS MOTHER CAUSING A PLUMMET IN HIS CREDIT SCORE AND SANITY.

5. LEADEC CORPORATION WRONGFULLY TERMINATED THE PLAINTIFF'S MOTHER AND KEPT THE HR HEAD CHERYL HERTFELDER EMPLOYED EVEN WITH ALL OF THE EVIDENCE OF DISCRIMINATION BROUGHT AGAINST HER. LEADEC CONTINUES TO ALLOW CHERYL TO DISCRIMINATE AND THE COURTS SHOULD CONSIDER VOIDING THE ARBITRATION AGREEMENTS THAT LEADEC HAS WITH IT'S WORKERS AT THE WENTZVILLE'S BRANCH IN LIGHT OF LEADEC WILLINGLY ALLOWING CHERYL TO VIOLATE FEDERAL LAW. THE PLAINTIFF GUARANTEES THAT THE EMPLOYEES WOULD FILE A CLASS ACTION IMMEDIATELY AS CHERYL HAS BRAGGED THAT THE ARBITRATION AGREEMENT PROTECTS HER FROM ACCOUNTABILITY.

THE CO-DEFENDANT MEGAN GLOWACKI ILLEGALLY AND EXTORTIONARILLY THREATENED THE PLAINTIFF BY THREATENING TO CALL LAW ENFORCEMENT ON HIM. THIS SHOCKING BEHAVIOR LEFT THE PLAINTIFF WONDERING IF THE CO-DEFENDANT SHOULD KEEP HER BAR OR HAVE IT REVOKED. THE PLAINTIFF IS ASKING THE COURTS TO REVIEW THE EMAIL & DETERMINE.

AMOUNT IN CONTROVERSY continued

THE DEFENDANT WAS GIVEN MANY OPPORTUNITIES BY THE PLAINTIFF TO SETTLE THE MATTER OUT OF COURT. INSTEAD THE DEFENDANTS OPTED TO WAIT UNTIL THE PLAINTIFF ACTUALLY FILED THE CURRENT LAWSUIT TO TAKE THE MATTERS SERIOUSLY.

BEFORE THE COURT IS THE ISSUE AS TO WHY THE HR HEAD CHERYL HERTFELDER WHO HAS A HISTORY THAT THE DEFENDANTS ARE NOW AWARE OF, OF TARGETING PEOPLE BASED UPON THEIR HEALTH ISSUES IS STILL EMPLOYED AND BREAKING FEDERAL LAW. IT IS THE PLAINTIFF'S BELIEF THAT LEADEC CORP SHOULD BE FINED THE MAXIMUM AMOUNT AVAILABLE TO LAW WHEN IT IS DETERMINED THAT THE MAIN TARGETS OF WRONGFUL TERMINATION BY CHERYL ARE BOTH MINORITIES AND HAVE FMLA OR PROTECTED BY THE ADA.

FEDERAL LAW IS A SERIOUS MATTER AND THE PLAINTIFF IS AWARE OF 2 PEOPLE WHO HAVE DIED DURING WRONGFUL TERMINATION PROCESS WHO DEPENDED UPON THE COMPANY FOR INSURANCE AND DIED WHILE WAITING ON GRIEVANCES. THE PLAINTIFF IS LUCKY HE KNOWS LAW OR HIS MOTHER COULD HAVE DIED AS WELL.

SECOND DEFENDANT continued

THE DEFENDANT, MEGAN GLOWACKI, IS A CITIZEN OF OHIO.
MEGAN, GLOWACKI @ THOMPSONHINE.COM
312 WALNUT STREET, 14TH FLOOR CINCINNATI, OHIO 45202
RELIEF FROM COURT continued

THE PLAINTIFF WOULD LIKE THE COURT TO REVIEW AND VOID THE FORCED ARBITRATION AGREEMENTS THE DEFENDANT LEADEC HAS BETWEEN IT'S EMPLOYEES. THE PLAINTIFF FEELS THE ONLY WAY THE DEFENDANT LEADEC WILL LEARN THAT TARGETING EMPLOYEES WITH MEDICAL HEALTH ISSUES IS BOTH UNETHICAL AND ILLEGAL, (THERE ARE MULTIPLE FEDERAL SUITS OUT AGAINST THE DEFENDANTS' ALLEGED VIOLATION OF ADA AND FLMA) IS TO REMOVE THIS PROTECTION WHICH FORCES MEDIATION WITH LIMITS TO RECOVERY. THROW THE BOOK AT THEM AND FINE THEM AND USE THE FINES TO BENEFIT THE LOCAL SCHOOLS AND GOVERNMENT. THESE ACTIONS MUST BE HELD ACCOUNTABLE BEFORE MORE VICTIMS DIE.